

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DISPLAY TECHNOLOGIES, LLC,

v.

ROCHE DIABETES CARE, LTD.,

CIV. NO. 2:23-cv-00585-JRG-RSP
Lead Case

DISPLAY TECHNOLOGIES, LLC,

v.

WONDERSHARE TECHNOLOGY
GROUP CO LTD,

CIV. NO. 2:24-cv-00046-JRG-RSP
Member Case

DISPLAY TECHNOLOGIES, LLC,

v.

VIVINT, INC.

CIV. NO. 2:24-cv-00098-JRG-RSP
Member Case

**WONDERSHARE’S OPPOSED MOTION FOR A HEARING DATE,
OR IN THE ALTERNATIVE, TO STAY
SCHEDULING CONFERENCE AS TO WONDERSHARE**

Defendant Wondershare Technology Group Co. Ltd. (“Wondershare”) respectfully requests a hearing before the Court on Wondershare’s Motion to Dismiss the Complaint for Ineffective Service of Process under Fed. R. Civ. P. 12(b)(5). (Case 2:24-cv-46, Dkt. No. 7). In the alternative, Wondershare requests a stay of the Scheduling/ Case Management Conference set for May 29, 2024 (Lead Case 2:23-cv-585, Dkt. 13) as to Wondershare until the motion is decided.

Wondershare extensively details the Plaintiff’s ineffective methods of service in its Motion and in its Reply. (See Case 2:24-cv-46, Dkt. No. 7 and 16). Plaintiff’s actions include submitting a false affidavit to this Court, using known legally ineffective methods of service, and moving for alternative service on the basis of these bad faith actions. Wondershare respectfully requests a hearing before the Court to assist in resolution of its Motion.

Importantly, Wondershare objects to being required to participate substantively in the litigation because service has not been effected and this Court lacks jurisdiction over Wondershare. Thus, in the alternative to a hearing, Wondershare respectfully requests a stay as to Wondershare of the May 29, 2024 Scheduling/Case Management Conference.

Dated: April 26, 2024

Respectfully submitted,

/s/ Darlene F. Ghavimi

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CERTIFICATE OF CONFERENCE

The undersigned attempted to confer with opposing counsel via email on April 24, 2024 and April 26, 2024 regarding whether or not Plaintiff opposes this motion and did not receive a response.

/s/ Darlene F. Ghavimi

Darlene F. Ghavimi

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was filed electronically via the Court's CM/ECF filing system. Therefore, this document was served on all counsel who are deemed to have consented to electronic service on this the 26th day of April, 2024.

/s/ Darlene F. Ghavimi

Darlene F. Ghavimi